

Exhibit A

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Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Case Nos. 19-30088 (DM) (Lead Case)
(Jointly Administered)

**[PROPOSED] ORDER EXTENDING
DEADLINE FOR THE REORGANIZED
DEBTORS TO OBJECT TO CLAIMS**

1 Upon the Motion, dated October 27, 2020 (the “**Motion**”),¹ [Dkt. No. •] of PG&E
2 Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors (together,
3 the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the
4 “**Chapter 11 Cases**”), in accordance with Section 7.1 of the Plan, sections 105(a) and 1142 of title
5 11 of the United States Code (the “**Bankruptcy Code**”), and Rule 9006(b) of the Federal Rules of
6 Bankruptcy Procedure (the “**Bankruptcy Rules**”), for entry of an order extending the deadline for
7 the Reorganized Debtors to object to claims by one hundred eighty (180) days, through and
8 including June 26, 2021, without prejudice to the Reorganized Debtors’ right to seek additional
9 extensions thereof; and consideration of the Motion and the requested relief being a core proceeding
10 pursuant to 28 U.S.C. section 157(b); and venue being proper before this Court pursuant to 28 U.S.C.
11 sections 1408 and 1409; and a hearing having been held on the Motion; and the Court having found
12 and determined that notice of the Motion as provided to the parties listed therein is reasonable and
13 sufficient, and it appearing that no other or further notice need be provided; and this Court having
14 reviewed the Motion and the McWilliams Declaration submitted in support thereof; and this Court
15 having determined that the legal and factual bases set forth in the Motion establish just cause for the
16 relief granted herein; and it appearing that the relief requested in the Motion is in the best interests
17 of the Debtors, their estates, creditors, shareholders, and all parties in interest; and upon all of the
18 proceedings had before this Court and after due deliberation and sufficient cause appearing therefor,

19 **IT IS HEREBY ORDERED THAT:**

- 20 1. The Motion is granted as provided herein.
- 21 2. The deadline for the Reorganized Debtors to object to Claims under Section 7.1 of the
22 Plan (as approved by Paragraph 31 of the Confirmation Order) is extended by one hundred eighty
23 (180) days, through and including June 26, 2021, without prejudice to the right of the Reorganized
24 Debtors to seek additional extensions thereof.

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26 ¹ Capitalized terms used but not herein defined have the meanings ascribed to such terms in the
27 Motion, the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated*
28 *June 19, 2020* [Dkt. No. 8048] (as it may be amended, modified, or supplemented and together
which any exhibits or schedules thereto, the “**Plan**”), or the *Order Confirming Debtors’ and*
Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020 [Docket
No. 8053] (the “**Confirmation Order**”), as applicable.

1 3. Consistent with the Plan and the Confirmation Order, the Debtors and Reorganized
2 Debtors shall have no obligation to object to Fire Victim Claims or Subrogation Wildfire Claims,
3 nor shall any such non-objection constitute an allowance or deemed allowance of any Fire Victim
4 Claim or Subrogation Wildfire Claim. Pursuant to the Plan and the Confirmation Order, all Fire
5 Victim Claims and Subrogation Wildfire Claims have been channeled to the Fire Victim Trust or
6 the Subrogation Wildfire Trust, as applicable, and shall be resolved by the applicable Fire Victim
7 Trust or Subrogation Wildfire Trust, in each case, without any recourse to or Claims whatsoever
8 against the Debtors or Reorganized Debtors or their assets and properties.

9 4. This Court shall retain jurisdiction to hear and determine all matters arising from or
10 related to the implementation, interpretation, or enforcement of this Order.

11
12 ** END OF ORDER **
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